

Message

From: Hambrick, Amy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=787B0A3376944FCABAED4F018432CF44-AHAMBRIC]
Sent: 8/1/2018 4:04:12 PM
To: Javier.Macias@carrizo.com
Subject: re: OOOOa Annual Report Question

Hi Javier-

The short answer: No, it is still considered draft.

The long answer:

The reports are required to be submitted- this can be done by submitting it to your delegated authority or through CEDRI. CEDRI is available to accept the 60.5420a(b) and 60.5422a(a) and (b) reports. Because EPA's template on the website you referenced is still considered "draft", the requirement to submit only through CEDRI is not triggered. Once the report is "final" then CEDRI reporting is mandatory. Hence, in the meantime, the report still must be submitted, but the vehicle to do that is either submit to delegated authority or through CEDRI. Make sense?

So from the reg text, once the **[final]** form has been available in CEDRI for 90 days, submittal through CEDRI is required. Up to this 90 day marker, submittal can be either CEDRI or the delegated authority. Excerpt from the reg text FYI:

"You must submit reports to the EPA via the CEDRI. (CEDRI can be accessed through the EPA's CDX (<https://cdx.epa.gov/>)). You must use the appropriate electronic report in CEDRI for this subpart or an alternate electronic file format consistent with the extensible markup language (XML) schema listed on the CEDRI Web site (<https://www3.epa.gov/ttn/chief/cedri/>). If the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, you must submit the report to the Administrator at the appropriate address listed in §60.4. Once the form has been available in CEDRI for at least 90 calendar days, you must begin submitting all subsequent reports via CEDRI. The reports must be submitted by the deadlines specified in this subpart, regardless of the method in which the reports are submitted."

Furthermore, as you may know, after OOOOa was finalized in 2016, EPA received administrative petitions seeking reconsideration of various aspects of the 2016 NSPS. EPA sent letters to petitioners granting reconsideration on April 18, 2017 and on June 5, 2017, EPA issued a *Federal Register* notice granting reconsidering on additional requirements. When EPA proposes amendments to OOOOa and updates the reporting template, the public will have an opportunity to comment on the template to help make it better. Be sure to stay plugged in and submit your comments when the opportunity comes round.

I'd be happy to answer any specific question you had on the report itself and or get you in touch with someone at your local EPA Regional office to assist.

Amy

Amy Hambrick
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From: Javier Macias [<mailto:Javier.Macias@carrizo.com>]
Sent: Wednesday, August 1, 2018 9:56 AM
To: Thompson, Lisa <Thompson.Lisa@epa.gov>
Subject: OOOOa Annual Report Question

Hello. is the Part 60 OOOOa annual report template currently available on EPA's website final yet? I've read two somewhat confusing statements on the site. Thank you.

- "Oil and Gas [60.5420a\(b\) Annual Report \(Spreadsheet Template\)](#) - spreadsheet template is available on the Oil and Gas rule webpage. CEDRI is available to collect this report electronically. However, facilities are not required to electronically submit the Annual Report until 90 days after the final template is posted in CEDRI. Please [contact us](#) if you have any questions related to the Part 60 OOOOa Annual Report."

"**October 6, 2017-** EPA posts [template spreadsheet](#) for reporting data required by the 2016 New Source Performance Standards. The 2016 standards include several electronic reporting requirements using the agency's [Compliance and Emissions Data Reporting Interface \(CEDRI\)](#). CEDRI can now collect these reports electronically, although the final template is not available. Until the final template is available in CEDRI, facilities may submit the Annual Report through CEDRI, but also must submit the report to the appropriate address(es) listed in 60.4(a) and (b). Note, facilities are not required to electronically submit the Annual Report until 90 days after the final template has been made available in CEDRI. EPA will update this page when final electronic reporting forms are available."

- [60.5420a\(b\) Annual Report \(Spreadsheet Template\)](#)